

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE EXPERIMENT

Docket No. MC2000-2

MAIL ADVERTISING SERVICE ASSOCIATION
INTERNATIONAL INTERROGATORIES TO UNITED STATES
POSTAL SERVICE WITNESS LEE GARVEY (MASA/USPS-T1-12)
(December 15, 1999)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, Mail Advertising Association International ("MASA") hereby submits interrogatories and requests for production of documents to United States Postal Service Witness Lee Garvey. For purposes of these interrogatories and document requests, "MOL" refers to the MOL Service that is the subject of these proceedings.

MASA/USPS-T1-1. Confirm that, on the first day of the experiment, if approved, MOL will not have the following capabilities:

- a. Full color printing;
- b. First class single piece mailings where the address is different for each piece;
- c. Nonprofit Standard Mail (A);
- d. Priority mail;
- e. Express mail; and
- f. International rates.

MASA/USPS-T1-2. For each of the capabilities listed in MASA/USPS-T1-1, state when you currently expect the capability to be available on MOL, and explain the basis for and any assumptions underlying your response.

MASA/USPS-T1-3. Identify all special services to which you refer on page 12 lines 10-11 of your testimony. With respect to each, answer the questions in MASA/USPS-T1-1 and MASA/USPS-T1-2.

MASA/USPS-T1-4. For what types of mailings will MOL have batching capability as of the beginning of the experiment, if approved; what additional types of mailings will MOL subsequently be able to batch before the end of the experiment; and when do you expect such additional batching to be possible? For each type of mailing for which batching will not be available at the beginning of the experiment, state when you currently expect batching to be available, and explain the basis for and any assumptions underlying your response.

MASA/USPS-T1-5. State whether any changes in MOL since the inception of Docket No. MC98-1 affect your belief that the users of MOL will be short-run small office/home office users of the mails. Please explain the reasons for your answer.

MASA/USPS-T1-6. State whether the USPS intends to make available to any other users of the mail an exemption from the minimum quantity requirements for automation discounts for standard or first class mail. If so, describe the criteria that the USPS will apply to determine whether a mailer qualifies for such exemption and explain the reason for each criterion. If not, explain why not.

MASA/USPS-T1-7. Identify all of the pre-qualified vendors seeking to provide print/mail services, as referenced at p. 7, lines 9-12 of your testimony, and specify which of them are members of MASA. Produce any list of pre-qualified vendors and all documents relating to the process of identifying and evaluating proposed printers.

MASA/USPS-T1-8. Identify all MASA members who have shared with you their expectation that MOL is likely to complement their marketing strategies and stimulate the total market for mailing, as stated at page 7, lines 12-15 of your testimony; describe in detail any communications you have had with them concerning this subject; and produce any documents related thereto.

MASA/USPS-T1-9. Have any MASA members or other mail preparation services shared with you any concerns about MOL? If so, identify the MASA members or others, describe in detail any communications you have had with them concerning this subject and produce any document related thereto.

MASA/USPS-T1-10. Confirm that "rapidly changing printing technology" during the three-year MOL experiment, if approved, could cause digital printing to become cost-efficient for runs well in excess of 5,000 pieces.

MASA/USPS-T1-11. Explain meaning of "third party value-added vendors" on page 13 line 2 of your testimony.

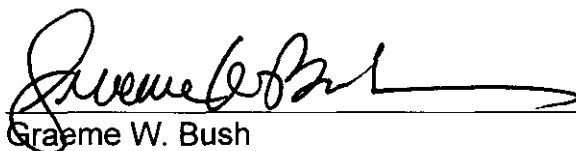
MASA/USPS-T1-12. State whether the USPS intends to make available to other users of the mail as well as through MOL on-line authentication for nonprofit status verification, and thereby to allow other users of the mail to use an authorization to enter nonprofit mail at more than a single post office.

MASA/USPS-T1-13. Did the market test produce any data that supports your testimony on page 17 lines 3-5 that MOL will offer opportunities for mail production and assembly services to benefit? If so, identify such data and explain how it supports your testimony.

Respectfully submitted,

Mail Advertising Service Association

By its attorneys:

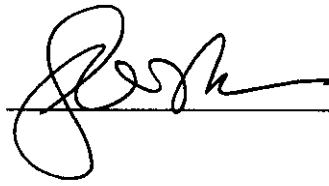
A handwritten signature in dark ink, appearing to read 'Graeme W. Bush', with a long horizontal flourish extending to the right.

Graeme W. Bush
Martin S. Himeles, Jr.
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December __, 1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Mail Advertising Service Association International Interrogatories to United States Postal Service Witness Lee Garvey was served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice this 15th day of December, 1999.

A handwritten signature in black ink, appearing to be "Josh", is written over a horizontal line.